



1                   **NOTICE IS HEREBY GIVEN** that a Motion to Clarify Plan Treatment Regarding  
2 Various Real Properties was filed on May 21, 2021 by Secured Creditors, U.S. Bank Trust  
3 National Association as Trustee of the Lodge Series III Trust, U.S. Bank Trust National  
4 Association as Trustee of the Chalet Series III Trust, U.S. Bank Trust National Association as  
5 Trustee of the Bungalow Series IV Trust, and U.S. Bank Trust National Association as  
6 Trustee of the Bungalow Series F Trust (collectively, “Secured Creditors”), creditors in this  
7 matter. The Motion seeks the following relief: enter an Order clarifying the treatment of  
8 Secured Creditors’ claims in Debtors’ confirmed plan and specifically confirming that the  
9 plan did not eliminate the requirement that Debtors make escrow payments to Secured  
10 Creditors. Any opposition must be filed pursuant to Local Rule 9014(d)(1).

11                   **NOTICE IS FURTHER GIVEN** that if you do not want the court to grant the relief  
12 sought in the Motion, or if you want the court to consider your views on the Motion, then you  
13 must file an opposition with the court, and serve a copy on the person making the Motion no  
14 later than 14 days preceding the hearing date for the motion, unless an exception applies (see  
15 Local Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts  
16 and legal authority, and be supported by affidavits or declarations that conform to Local Rule  
17 9014(c).

18

19

20

21

22

23

24

25

26

27

28

If you object to the relief requested, you *must* file a **WRITTEN** response to this  
pleading with the court. You must also serve your written response on the person  
who sent you this notice. If you do not file a written response with the court, or if  
you do not serve your written response on the person who sent you this notice,  
then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing

///

1                   **NOTICE IS FURTHER GIVEN** that the hearing on the said Motion will be held  
2 before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas  
3 Boulevard South. Bankruptcy Courtroom Number 2, Las Vegas, Nevada 89101 on June 23,  
4 2021 at the hour of 9:30 a.m.

5                   DATED: May 21, 2021

GHIDOTTI | BERGER LLP

6                   By: /s/ Regina A. Habermas, Esq.  
7                   Regina A. Habermas, Esq.  
8                   Nevada Bar No. 8481  
9                   415 S. 6<sup>th</sup> Street, #310  
10                   Las Vegas, NV 89101  
11                   ghabermas@ghidottiberger.com  
12                   Attorneys for Secured Creditors

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28